



2012-13 Charter Review Report

Imagine Southeast Public Charter School

January 7, 2013

DC Public Charter School Board
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Washington, DC 20010
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RECOMMENDATION

PCSB staff recommends Imagine Southeast Public Charter School's charter be revoked based on the school's failure to meet its goals and student academic achievement expectations.

EXECUTIVE SUMMARY

Imagine Southeast PCS is a charter Local Education Agency with one campus that has been operating in the District of Columbia since August 2008. The school has remained on the lower spectrum of Tier 2 since the Performance Management Framework ("PMF") was instituted in 2010-11. In that year, the school scored 35.7% on the PMF; in 2011-12, its PMF score remained essentially unchanged at 35.6%.

Imagine Southeast PCS has failed to meet four of its five goals and academic achievement expectations set forth in its charter agreement and accompanying documents: those regarding reading, mathematics, attendance, and parent satisfaction. Its students' DC-CAS scores have remained consistently below the statewide average, and these scores have not improved significantly since the school's first year in operation. In 2011-12, its average attendance was the lowest of all the Ward 8 elementary and middle schools. Its reenrollment rate has remained below 70%, indicating that parents are not satisfied with the school.

Additionally, Imagine Southeast PCS has been in compliance with several applicable laws since it began operating. This, along with its failure to meet key academic goals and expectations, leads PCSB staff to recommend that Imagine Southeast PCS' charter be revoked.

GOALS AND ACADEMIC ACHIEVEMENT EXPECTATIONS

The District of Columbia School Reform Act (“SRA”) provides that PCSB must review whether a school has met its goals and student academic achievement expectations set forth in its charter at least once every five years. Goals are general aims, which may be categorized as academic, non-academic, or organizational, whereas student academic achievement expectations (“expectations”) are student academic aims measured by assessments. As part of its five-year review, PCSB considers those goals and expectations that the eligible chartering authority approved in a school’s charter agreement, any subsequent charter amendments, and/or Accountability Plans (collectively, the “Charter”).

Imagine Southeast PCS detailed eight goals in its charter application, and this number was reduced to five in a subsequently created Accountability Plan.¹ For the purposes of this review, PCSB analyzed these five goals included in the school’s Accountability Plan. Some of these goals were further refined in 2010 and 2011, when Imagine Southeast PCS set separate early childhood targets.

Imagine Southeast PCS has not met 4 of its 5 goals and academic achievement expectations. The chart below summarizes these determinations, which are detailed in the body of this report.

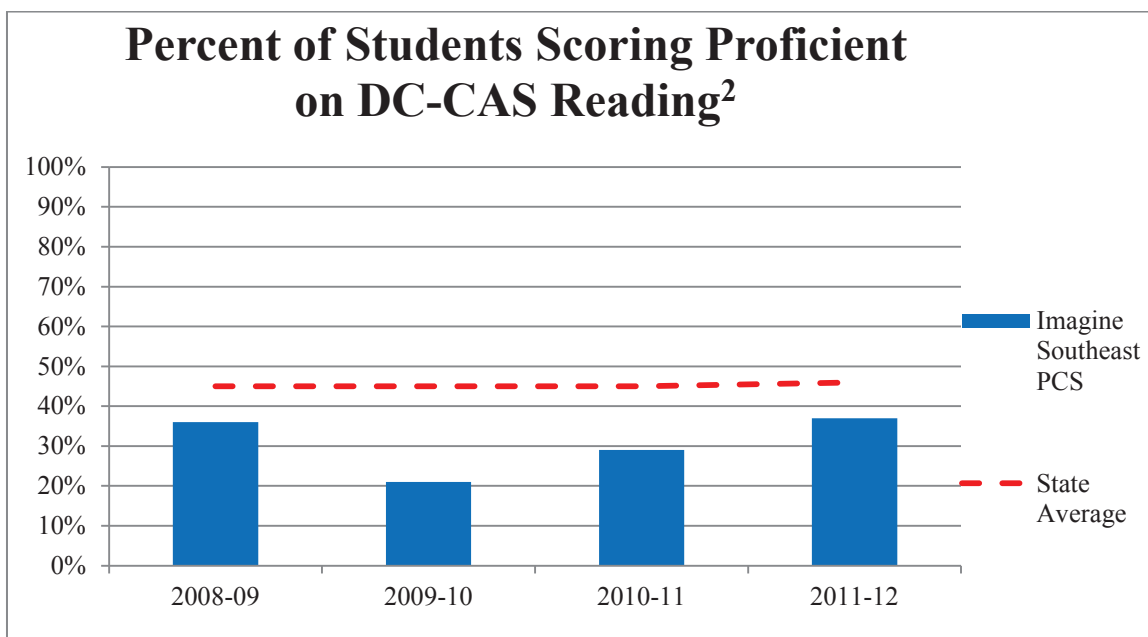
| | Goal or Expectation | Met? |
|---|---|-------------|
| 1 | Students will be strong readers. | No |
| 2 | Students will master key concepts related to mathematics and apply them effectively in observing, analyzing, and problem solving. | No |
| 3 | Imagine Southeast PCS students will regularly attend school. | No |
| 4 | Imagine Southeast PCS will effectively manage negative student behavior. | Yes |
| 5 | Parents will indicate high levels of satisfaction with the school’s program. | No |

¹ Goals that were removed were in regard to positive student behavior, quality teachers and professional development, and student character development. See Imagine Southeast PCS charter application, attached to this document as Appendix A. See Imagine Southeast PCS 2008-09 Accountability Plan, attached to this document as Appendix B.

1. **Imagine Southeast PCS students will be strong readers.**

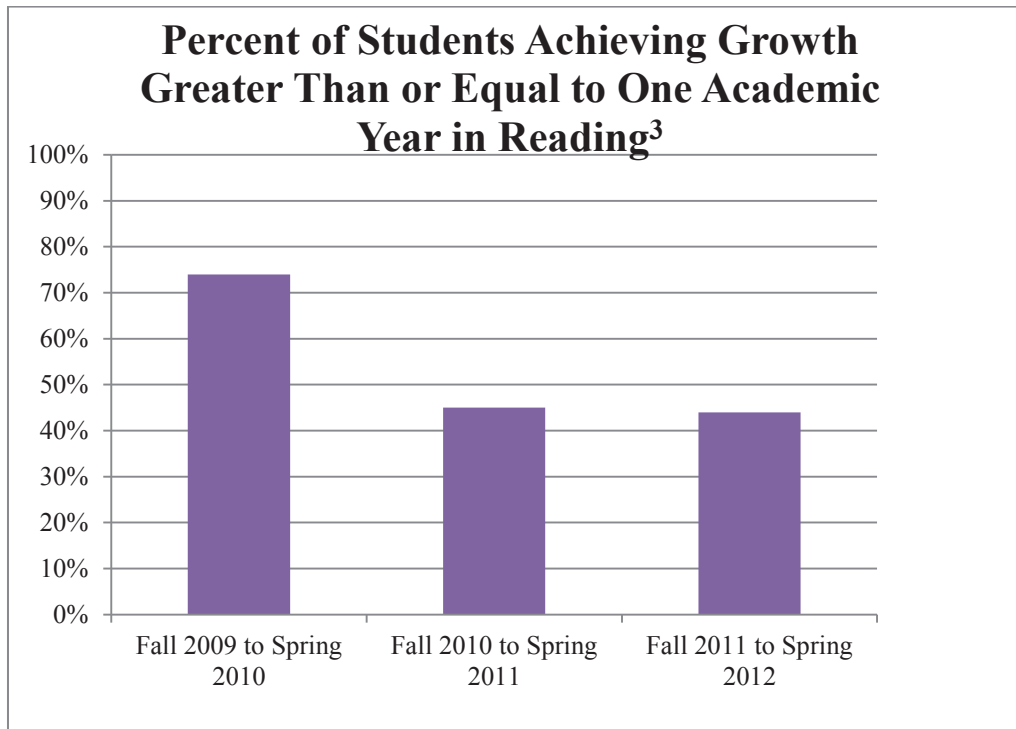
Assessment: **Imagine Southeast PCS has failed to meet this goal.** While the school did meet some of its early childhood reading goals, it has failed to increase the percentage of students testing proficient in reading.

Only 36% of Imagine Southeast PCS students scored proficient in reading in the school's first year in operation. The next year, the proficiency rate dropped by 15%. While the proficiency rate did increase in the following two years, it remains dismally low. Its students reading proficiency rate is consistently 10-20% below the state reading proficiency average.



² Data sourced from www.focusdc.org/data.

Imagine Southeast PCS assesses its students' growth in reading abilities over a course of an academic year using the Stanford-10 assessment. The percentages in the below graph indicate the proportion of students who achieved growth greater than or equal to one academic year in reading. There was a significant drop in growth from the 2009-10 school year to the 2010-11 school year. Only 44% of students achieved at least one academic year of growth in reading from Fall 2011 to Spring 2012.



³ Source for data: www.imagineschools.com/2011/03/imagine-southeast-public-charter-school. This data has not been validated by PCSB.

Early Childhood Reading Targets

In 2010-11, Imagine Southeast PCS began setting specific reading targets for its pre-school and pre-kindergarten students in an Early Childhood Accountability Plan. It has had mixed results in meeting these goals – it met three of the targets and failed to meet two targets.

| 2010-11 Early Childhood Reading Targets⁴ | Target Met? |
|---|--|
| 60% of K-2 students will demonstrate academic progress greater than or equal to the expected growth in reading on the Stanford Achievement Test (“SAT-10”). | No: 31.3% of students scored greater than or equal to the expected level of growth. |
| 60% of K-2 students will score at or above stanine 4 in reading on the SAT-10. | Yes: 71% of students scored at or above stanine 4. |
| 2011-12 Early Childhood Reading Targets⁵ | Target Met? |
| 80% of pre-kindergarten-3 students will advance one level or maintain readiness in literacy (print) on the Core Knowledge Preschool Assessment Test (“CK-PAT”). | Yes: 94.1% of students advanced one level or maintained readiness. |
| 80% of pre-kindergarten-4 students will advance one level or maintain readiness in literacy (phonemes) by the spring administration on the CK-PAT. | No: 78% of students maintained readiness. |
| 60% of K-2 students will score at or above stanine 4 in reading on the SAT-10. | Yes: 64.6% of students scored at or above stanine 4. |

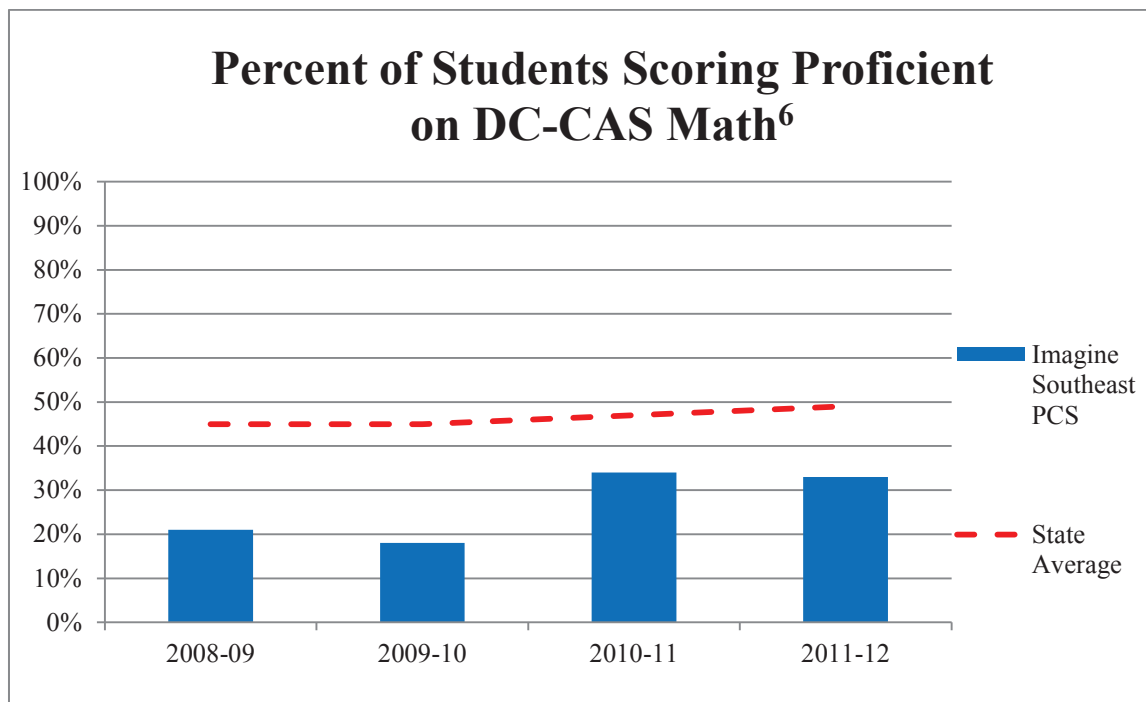
⁴ See Imagine Southeast PCS 2010-11 Accountability Plan Data Verification, attached to this document as Appendix C.

⁵ See Imagine Southeast PCS 2011-12 Early Childhood Accountability Plan, attached to this document as Appendix D.

2. **Imagine Southeast PCS students will master key concepts related to mathematics and apply them effectively in observing, analyzing and problem solving.**

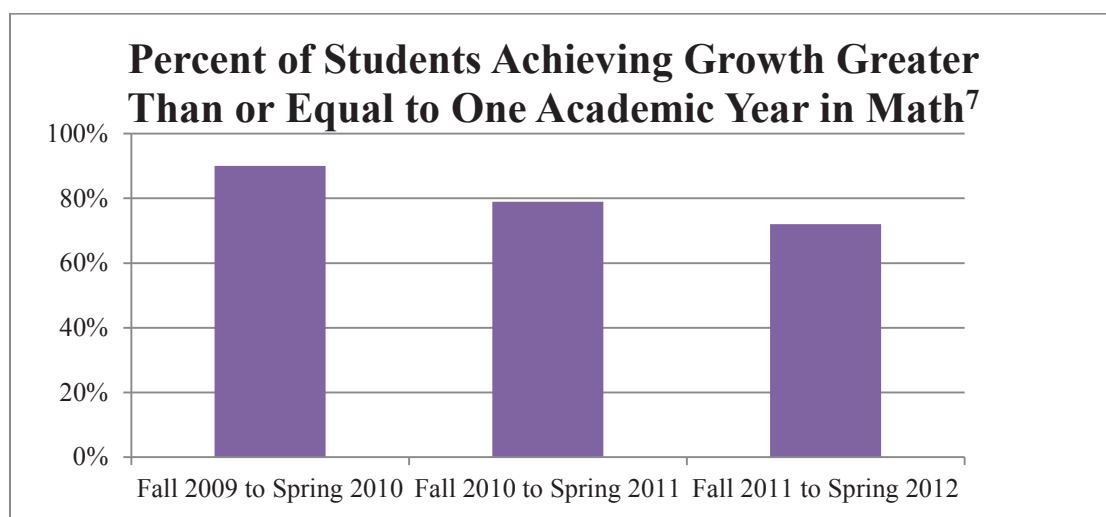
Assessment: **Imagine Southeast PCS has failed to meet this goal.** While the school has met the early childhood targets that it set, it has failed to significantly increase the percentage of its students testing proficient in mathematics.

The percent of Imagine Southeast PCS students scoring proficient on the DC-CAS mathematics section dropped between its first and second year. This rate increased from its second to third year, and then dropped by 1% in 2011-12. Its 2011-12 mathematics proficiency rate remains 16% lower than the state mathematics proficiency average.



⁶ Data sourced from www.focusdc.org/data.

Imagine Southeast PCS showed great promise in 2008-09, with 90% of its students achieving at least one year of growth in math, as measured by the Stanford-10 test. However, that rate has declined every subsequent year.



Early Childhood Mathematics Targets

In 2010-11 and 2011-12, Imagine Southeast PCS set specific mathematics targets for its pre-school and pre-kindergarten students in an Early Childhood Accountability Plan. It has met all of these goals.

| 2010-11 Early Childhood Math Targets⁸ | Target Met? |
|---|---|
| 60% of K-2 students will demonstrate academic progress greater than or equal to the expected growth in mathematics on the Stanford Achievement Test (“SAT-10”). | Yes: 78.8% of students scored greater than or equal to the expected level of growth. |
| 60% of K-2 students will score at or above stanine 4 in mathematics on the SAT-10. | Yes: 73.6% of students scored at or above stanine 4. |
| 2011-12 Early Childhood Math Targets⁹ | Target Met? |
| 80% of pre-kindergarten-4 students will advance one level or maintain readiness in math on the Core Knowledge Preschool Assessment Test (“CK-PAT”). | Yes: 91.8% of students advanced one level or maintained readiness. |
| 60% of K-2 students will score at or above stanine 4 in math on the SAT-10. | Yes: 70.9% of students scored at or above stanine 4. |

⁷ Source for data: www.imagineschools.com/2011/03/imagine-southeast-public-charter-school. This data has not been validated by PCSB.

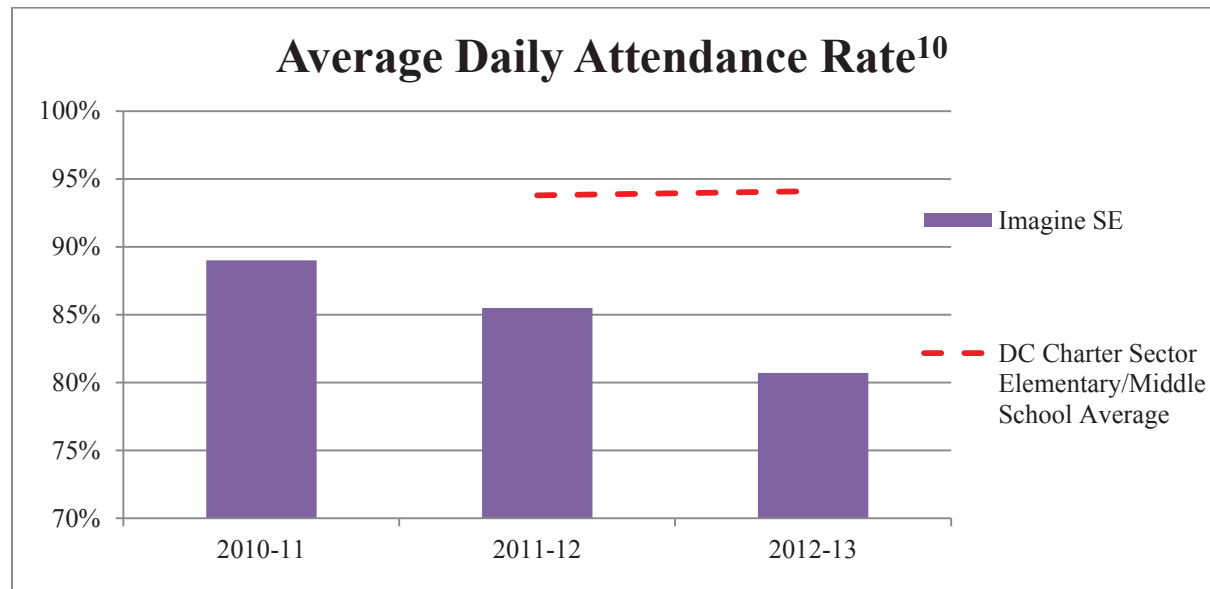
⁸ See Appendix C.

⁹ See Appendix D.

3. Imagine Southeast PCS students will regularly attend school

Assessment: **Imagine Southeast PCS has failed to meet this goal.**

Imagine Southeast PCS' average attendance rate has declined since 2010-11 and is consistently lower than the DC charter sector average attendance rate. In 2011-12, Imagine Southeast PCS had the lowest attendance rate of all Ward 8 elementary and middle schools.¹⁰



Additionally, Imagine Southeast PCS failed to meet its 2011-12 early childhood attendance targets.

| 2011-12 Early Childhood Attendance Targets ¹² | Target Met? |
|--|---|
| On average, pre-kindergarten-3 and pre-kindergarten-4 students will attend school 88% of the days. | No ; these students' average daily attendance was 82%. |
| On average, K-2 students will attend school 92% of the days. | No ; these students' average daily attendance was 84.6%. |

¹⁰ See Ward 8 Attendance and Reenrollment Rates, attached to this document as Appendix E.

¹¹ As reported in the PMF.

¹² See Appendix D.

4. **Imagine Southeast PCS will effectively manage negative student behavior.**

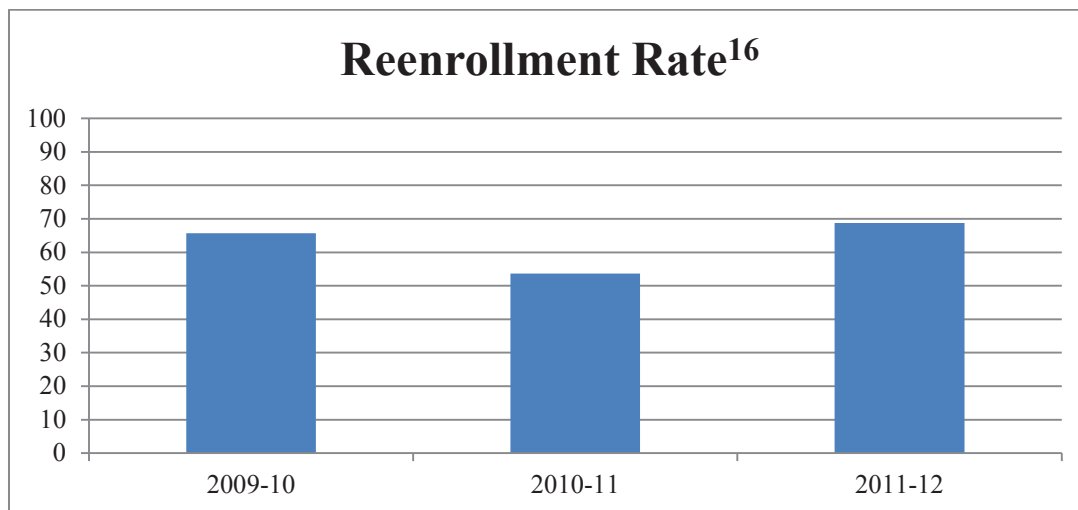
Assessment: Imagine Southeast PCS has met the goal of effectively managing negative student behavior.

In 2009-10 and 2010-11, Imagine-Southeast PCS did not suspend any students for ten or more days, and did not expel any students.¹³ In 2011-12, only 5% of Imagine-Southeast PCS' students were suspended or expelled. This is below the DC charter sector average of 13%.¹⁴ This amounted to 0.1% of instructional days lost, which is also below the DC charter sector average of 0.4%.

5. **Parents will indicate high levels of satisfaction with the school's program.**

Assessment: **Imagine Southeast PCS has not met this goal.**

Imagine Southeast PCS indicated in its Accountability Plan that student reenrollment would be a measure of parent satisfaction. After the school's first year, 65.73% of its students reenrolled; the next year the reenrollment rate decreased to 53.7%. In 2011-12, the school's reenrollment rate increased to 68.8%. Out of the nine charter schools in Ward Eight serving elementary and middle school students, Imagine Southeast PCS had the third lowest reenrollment rate in 2011-12.¹⁵



¹³ http://www.dcpubliccharter.com/data/images/copy%20of%202019-2011_attendance_discipline%20data%209.19.12.pdf.

¹⁴ http://www.dcpubliccharter.com/data/images/copy%20of%20council_attendance_discipline_by_school_09_26_2012.pdf.

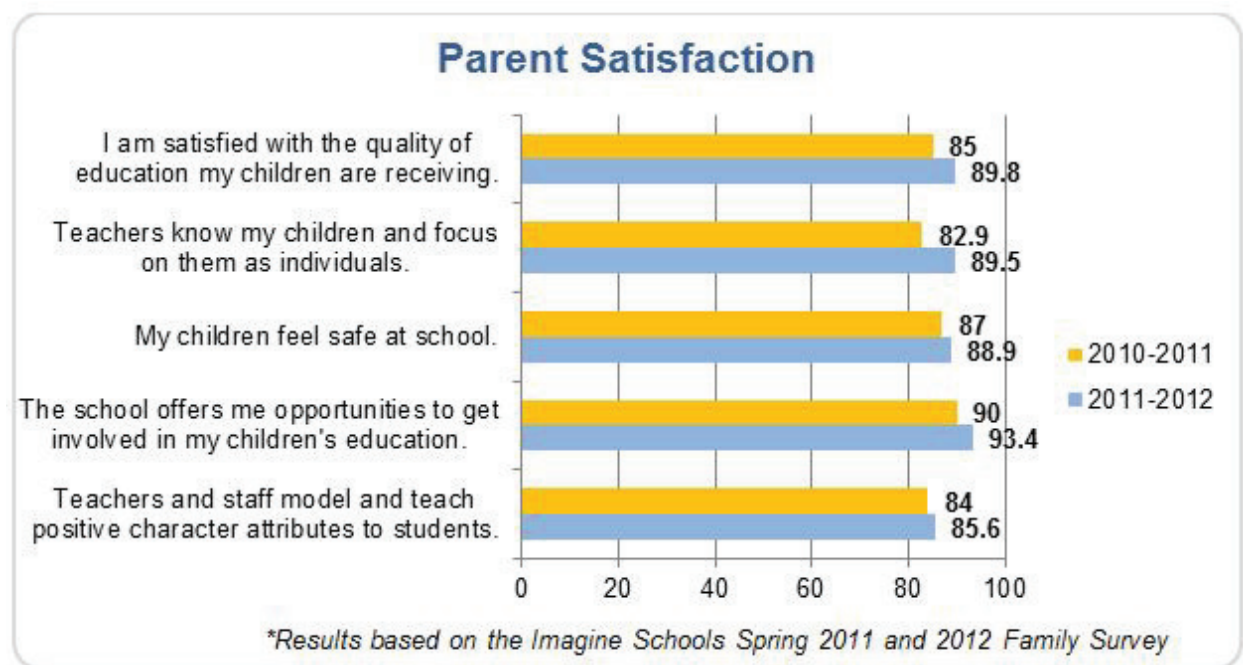
¹⁵ See Appendix E.

¹⁶ The 2009-10 reenrollment rate was sourced from Imagine Southeast PCS' 2009-10 annual report, attached to this document as Appendix F. 2010-11 and 2011-12 dates are sourced from the PMF.

Additionally, Imagine Southeast PCS failed to meet its 2010-11 early childhood reenrollment targets. After failing to meet these targets, it did not set new early childhood reenrollment goals in 2011-12.

| 2010-11 Early Childhood Reenrollment Targets¹⁷ | Target Met? |
|---|--|
| 80% of eligible pre-school and pre-kindergarten students will reenroll. | No. 53% of students reenrolled. |
| 80% of eligible K-2 students will reenroll. | No. 62% of students reenrolled. |

However, Imagine Schools, the Education Management Organization that manages Imagine Southeast PCS, details on its website the following positive results of a Parent Satisfaction survey conducted at Imagine Southeast PCS in school years 2010-11 and 2011-12.¹⁸



¹⁷ See Appendix C.

¹⁸ <http://www.imagineschools.com/2011/03/imagine-southeast-public-charter-school/> (accessed December 20, 2012).

COMPLIANCE WITH APPLICABLE LAWS

The SRA provides that PCSB shall not approve a charter renewal application if it determines that the school has committed a material violation of applicable laws.¹⁹ Several such laws are specifically referenced in the SRA, and PCSB has also monitored schools' compliance with additional laws. The following section identifies these laws and includes a determination of whether Imagine Southeast PCS has consistently complied with these laws over the past five years.

General Laws

Health and Safety

The SRA requires schools to maintain the health and safety of all its students.²⁰ Imagine Southeast PCS violated this SRA provision in 2008-09 when it did not have an emergency response plan in place, and did not conduct an emergency evacuation drill within the first ten days of school, as required by the DC Fire Marshal.²¹

Discipline

PCSB reviews school discipline policies to ensure they afford students due process²² and that parents and students are made aware of these due process safeguards. In Imagine Southeast PCS' 2008-09 compliance review, it was noted that the school had not disseminated its suspension and expulsion policies to students, parents, and staff.²³ In 2011-12, the school's discipline procedures were not found to sufficiently afford its students due process.²⁴ Imagine Southeast PCS' 2012-13 compliance report indicates that the school has cured this deficiency.²⁵

Enrollment and Attendance

The SRA requires schools to conduct a fair and open enrollment process that randomly selects applicants and does not discriminate against students. In 2009-10, Imagine Southeast PCS was

¹⁹ SRA §38-1802.12(c)(2).

²⁰ SRA §38-1802.6(g).

²¹ See Imagine Southeast PCS Compliance Review Report 2008-09, attached to this document as Appendix E.

²² As required by *Goss v. Lopez*, 419 US 565 (1975).

²³ See Imagine Southeast PCS Compliance Review Report 2008-09, attached to this document as Appendix EG.

²⁴ A note is included in the report that "The [Imagine Southeast PCS] [B]oard will develop a due process by the next board meeting." See Imagine Southeast PCS Compliance Review Report 2011-12, attached to this document as Appendix H.

²⁵ See Imagine Southeast PCS Compliance Review Report 2012-13, attached to this document as Appendix I.

found to have not adequately publicly announced its enrollment procedures.²⁶ In 2011-12, it was noted that Imagine Southeast PCS' application "asks for information that is not allowable" and that a lottery cutoff date was not noted.²⁷

Governance

The SRA requires that a school's board of trustees have an odd number of members on it that does not exceed fifteen, of which the majority must be DC residents, and two must be parents.²⁸ In 2008-09, Imagine Southeast PCS' board was found to be out of compliance with this law: there was not an odd number of board members, a majority of the board was not DC residents, and there were not at least 2 parents on the board.²⁹ Its current board is out of compliance with the SRA requirements: it does not have an odd number of board members, a majority of its board members do not live in DC, and there are not two parents serving as board members.³⁰

Special Education Laws

Schools are required to comply with Subchapter B of the Individuals with Disabilities Education Act³¹ and Section 504 of the Rehabilitation Act of 1973.³² In 2012, PCSB conducted a desktop audit of eight special education indicators to assess Imagine Southeast PCS' compliance with these laws. This audit indicated that the school does not always develop IEP plans or evaluate students with an IEP plan in a timely manner; additionally, the school does not always organize IEP meetings properly with all required participants in attendance.³³ Additionally, in 2011, OSSE analyzed a random sample of Imagine Southeast PCS students with disabilities, and found that the school had not properly prepared Behavioral Intervention Plans for many of these students.³⁴

Financial Laws

Procurement Contracts

SRA §38-1802.04(c)(1) requires DC charter schools to utilize a competitive bidding process for any procurement contract \$25,000 or more, and within three days of awarding such a contract, to

²⁶ PCSB PMF Compliance Review Initial Screen Status Report (2009-10).

²⁷ See Appendix H.

²⁸ SRA §38-1802.5(a).

²⁹ See Appendix G.

³⁰ See Imagine Southeast PCS Board Roster (current as of December 17, 2012), attached to this document as Appendix J.

³¹ 20 USC §1411, *et seq.*

³² 20 USC §794.

³³ Imagine Southeast PCS Special Education Desktop Audit (2012); OSSE Quarterly Findings (June 29, 2012), attached to this document as Appendix K.

³⁴ OSSE Compliance Monitoring Report (2011), attached to this document as Appendix L.

submit to PCSB all bids received, the contractor selected, and the rationale for which contractor was selected. To ensure compliance with this law, PCSB requires schools to submit a Determinations and Findings form to detail any qualifying procurement contract entered into.

Imagine Southeast PCS only submitted five Determination and Findings for such contracts from 2008-2010. In the school's 2011-12 audit, seven \$25,000+ expenditures were identified for which Imagine Southeast PCS should have submitted a corresponding Determination and Findings form, but only one such form was submitted to PCSB for review, indicating that Imagine Southeast is out of compliance with the contracting provision of the SRA.

FISCAL MANAGEMENT AND ECONOMIC VIABILITY

The SRA requires the Board to revoke a charter at any time if it determines that the school:

- Has engaged in a pattern of nonadherence to generally accepted accounting principles;
- Has engaged in a pattern of fiscal mismanagement; or
- Is no longer economically viable.

As part of the 5-year charter review process, PCSB has reviewed Imagine Southeast PCS's financial record regarding these areas and concludes that the school's fiscal management and economic viability is not one of the bases for its proposal to revoke the school's charter.